

Denise Carlon , ESQUIRE
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Attorneys for Nationstar Mortgage LLC D/B/A Mr. Cooper

IN THE MATTER OF:

Suzanne Michelle Venezia Bryan Steven
Venezia

DEBTOR,

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-11421 VFP

NOTICE OF OBJECTION

The undersigned, Denise Carlon , Esquire For KML Law Group, P.C., attorney for Secured Creditor **Nationstar Mortgage LLC D/B/A Mr. Cooper**, the holder of a Mortgage on the debtors' premises at **18 Mountain View Court Hardyston, NJ 07419** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. On March 9, 2018, Secured Creditor filed a secured proof of claim for pre-petition arrears in the amount of \$2,287.19.
2. Debtor's plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$2,287.19, and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/ Denise Carlon , Esquire

Denise Carlon , Esquire

Attorney for Nationstar Mortgage LLC D/B/A Mr. Cooper

Dated: March 19, 2018